

Douglas D. Orvis II
douglas.orvis@bingham.com

May 30, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Compliance Plan of Sage Telecom, Inc., WC Docket Nos. 09-197 and 11-42

ATTENTION: Chief, Telecommunications Access Policy Division, Wireline
Competition Bureau

Dear Ms. Dortch:

Sage Telecom, Inc. ("Sage"), through its attorneys, hereby notifies the Wireline Competition Bureau of several internal corporate changes that will affect the provision of Lifeline Service under Sage's Compliance Plan approved December 26, 2012. As part of this change, in the near future, Lifeline services will not be offered by Sage, but by a newly-created affiliated corporation called Sage Telecom Communications, LLC ("Sage, LLC"). Sage respectfully requests the Commission update its records regarding Sage's Compliance Plan and Lifeline services to reflect that such services are now provided by Sage, LLC.

Sage is a competitive local exchange carrier in 26 states and has been designated as an eligible telecommunications carriers ("ETC") in several states. In 2012, pursuant to the rules and procedures adopted in the *Lifeline Reform Order*,¹ Sage submitted a Compliance Plan to obtain a limited ETC designation to provide wireless Lifeline services. Sage's Compliance Plan was approved on December 26, 2012,² and Sage has initiated its Lifeline services for qualified low income consumers in certain service areas.

During the first quarter of 2013, Sage filed the necessary applications with the applicable state public utility commissions to obtain approval for a change in corporate structure.³

¹ *In the Matter of Lifeline and Link Up Reform and Modernization*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (2012) ("*Lifeline Reform Order*").

² *Wireline Competition Bureau Approves the Compliance Plans of Airvoice Wireless, et al.*, Public Notice, DA 12-2063 (rel. Dec. 26, 2013).

³ Commission rules require post-closing notification, which will be filed by Sage in the near future within the required time after the transaction closes.

Beijing
Boston
Frankfurt
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T +1.202.373.6000
F +1.202.373.6001
bingham.com

Ms. Marlene H. Dortch
May 30, 2013
Page 2

As further detailed in the attached corporate structure chart, the transaction will result in the services provided by Sage, including Lifeline services being provided by Sage, LLC. Certificates to provide telecommunications services are being moved from Sage to Sage, LLC by state commissions. Even though the technical entity has changed, the ultimate parent company remains the same, and the same management and executives remain in charge of policies and procedures. All other information about the company's services and policies as set forth in the Compliance Plan remain accurate. Sage, LLC will offer Lifeline services in accordance with the commitments originally made by Sage in the Compliance Plan.

The transaction will be completely transparent to consumers who will continue to receive the same services, including Lifeline services, under the same terms and conditions as they do now under the "Sage" trade name.

As such, in order to avoid consumer confusion and interruption to Lifeline services provided to low income consumers, Sage respectfully requests that the Bureau revise its records to reflect the Compliance Plan of Sage under the new entity. Ideally, to avoid confusion, the record would list "Sage Telecom Communications, LLC formerly Sage Telecom, Inc." as the entity with an approved Compliance Plan.

Please contact the undersigned with any questions about this matter.

Respectfully Submitted,

/s/

Douglas D. Orvis II
Kimberly A. Lacey

cc: Kim Scardino (via email)